#### TESTIMONY

of

#### JEANNE BONDAREVSKIS

before the

PUBLIC UTILITIES COMMISSION

FOR

GENERAL RATE RELIEF

for

PROVIDENCE WATER

March 2007

1	Q.	Please state your full name and title?
2	A.	Jeanne Bondarevskis, Director of Finance for the
3		Providence Water Supply Board (Providence Water).
4		
5	Q.	How long have you been employed by Providence Water?
6	Α.	I have been employed since March of 1987 or approximately
7		20 years.
8		
9	Q.	Would you please state your education, background and
10		professional associations?
11	A.	I have a Master's Degree in Business Administration from
12		Bryant College. I graduated Magna Cum Laude from
13		Providence College with a Bachelor of Science Degree,
14		majoring in Accounting.
15		
16		I have worked for Providence Water since March of 1987.
17		Prior to becoming Director of Finance, I was responsible
18		for the Accounting area, the preparation of various
19		reports, assistance to outside consultants and/or
20		auditors, and I was Acting Director of Finance. I have
21		participated to some degree in all of Providence Water's
22		PUC and Division filings dating back to Docket 1900.
23		
24		Since August of 1994, I have been a member of the New
25		England Water Works Association Program Committee. I
26		also am a member of the American Water Works Association
27		and New England Water Works Association. Since January
28		of 2002, I have been Treasurer of the Rhode Island Water
29		Works Association.

1	Q.	Please explain your duties and responsibilities.	
2	Α.	As Director of Finance I am responsible for four areas or	
3		Divisions. They are Accounting, Training, Financial	
4		Planning and Management Information Systems.	
5			
6	Q.	What is the purpose of your testimony?	
7	Α.	To address certain issues related to the General Rate	
8		Filing.	
9			
10	Q.	What issues are being addressed in this testimony?	
11	Α.	My testimony will address: 1) additional Infrastructure	
12		funding requirements; 2) transfer of meter replacement	
13		funding from Infrastructure to AMR/Meter Replacement; 3)	
14		City services and past retiree's health coverage; and 4)	
15		revenue instability.	
16			
17		Infrastructure Funding	
18	Q.	Is Providence Water requesting any additional	
19		Infrastructure funds?	
20	A.	Yes. Providence Water is requesting an additional \$2	
21		million in Infrastructure funding. In April 2006,	
22		Providence Water filed a balanced twenty year	
23		Infrastructure Replacement (IFR) plan with the RI	
24		Department of Health (DOH). However, in August 2006	
25		Providence Water received a Notice of Violation from the	
26		DOH concerning our lead sampling. This triggered a	
27		number of mandatory corrective measures. These include	
28		the distribution of a notification to our customers and,	

most important, accelerated replacement of 7% of our 1 water system's lead services each year, for possibly the 2 next fifteen years. While Providence Water has a lead 3 service replacement program and had this project funded 4 in our long term IFR program, the dramatic and mandatory 5 acceleration of the replacement has resulted in timing 6 and cost pressure on our total IFR program. 7 8 In addition, in November 2006 the Water Supply Board was 9 given a presentation by Maguire Group regarding the 10 upgrade of the Filters in our Treatment Plant. Maguire 11 Group's design concept report identified the costs 12 associated with replacing our old filtering system in 13 kind, or adopting their recommendation, which would 14 significantly enhance the improvements to be made to the 15 filters. The Board voted at the December 2006 meeting to 16 adopt the enhanced improvements, which will require 17 additional funds for the program. 18 19 Another project, the rehabilitation of the Sedimentation 20 enhanced significant Basins. require 21 could also improvements in order to take full advantage of the 22 Treatment Plant filter upgrades. 23 24 The financial effect of these changes has resulted in a 25 projected deficit in our IFR program/plan 26 approximately \$83 million over the next 20 years. 27 28

29

In order to address this significant shortfall, a

1		combination of new rate revenue and new long term bonding
2		will be necessary. The bonding will occur in two phases
3		to allow for additional studies and piloting to take
4		place.
5		
6		The first phase of the new borrowing will need to occur
7		for fiscal year 2009, which begins July 1, 2008. We
8		estimate a drawdown of approximately \$7.5 million in FY
9		2009 and 2010. Schedule WEE 10C in Walter Edge's
10		testimony shows the anticipated funding for the
11		Infrastructure Replacement fund for FY 2007 through FY
12		2010.
13		
14	Q.	Will Providence Water be seeking Division approval of the
15		proposed borrowing?
16	Α.	Yes. We plan to file soon. We hope to close the bond by
17		June 30, 2008.
18		
19	Q.	Will Providence Water be revising their IFR Plan?
20		
21	A.	Yes. Our Engineering department will be preparing an
22		amendment to the 20 year plan. Finance will project the
23		financial impact of the changes, for inclusion in the
24		revised plan.
25		
26	Q.	Has the Water Supply Board approved the borrowing?
27	А.	Yes. They approved the borrowing and the necessary Board
28		Resolutions at the February 2007 meeting.

Q. Will the \$2 million you are requesting in additional IFR funding be sufficient?

A. It will be sufficient through FY 2010. However, we will be borrowing in phases and therefore we may require additional increased funding to pay for the additional debt. We are having First Southwest and PFM prepare some financial models and recommendations to assist us in the debt planning.

9

10

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

3

4

5

6

7

8

#### AMR/Meter Replacement funding

- Q. Why is Providence Water proposing to move \$600,000 of funding from Infrastructure to AMR/Meter Replacement if additional Infrastructure funding is needed?
  - The AMR fund was established in Docket 2304, which took Α. effect on 12/26/95. The purpose of the funding was to install Automated Meter Reading (AMR) devices Providence Water's retail customer base. Providence Water has been very successful in the AMR installation program, and is nearing completion. Over the years Providence Water has funded replacement of the meters from Infrastructure funds, and the automated meter reading devices, plumbing repairs, and reading equipment has been funded from the AMR fund. While we plan to continue to include the replacement of meters in our Infrastructure plans, we are requesting the PUC to allow us to transfer the \$600,000 that we have in our IFR plan for annual purchase of meters, to AMR so that all meter related costs can be consolidated in our AMR/Meter

Replacement fund. Our Commercial Services department is 1 responsible for all aspects of metering which includes large meter replacements, large meter testing, 3 meter installations, and AMR installations, and it would 4 be very helpful to have all of these costs consolidated. 5 We are proposing no change to the funding level beyond 6 this transfer. City Services and Past Retiree's Health Coverage 9 Have you reviewed the City Service analysis prepared by 10 Q. 11 Mr. David Bebyn? Yes I have. I participated in meetings with the City 12 Α. Finance department and David. I have reviewed David's 13 calculations and agree with the amounts. 14 15 Are you aware of the City's request for past retiree's 16 Q. health coverage? 17 Providence Water has not been reimbursing the 18 Α. Yes I am. City for the cost of Providence Water retiree's health 19 This was discovered in fiscal year 2006. 20 Providence Water was able to pay the City for the fiscal 21 year 2006 cost of \$330,613. We have included this as a 22 line item, GASB 43/451 Reserve, in the filing so that 23 going forward, there will be funds to pay this.

24

<sup>&</sup>quot;In 2004, the Governmental Accounting Standards Board (GASB) issued Statement 45, "Accounting and Financial Reporting by Employers for Post-Employment Benefits Other Than Pensions," which requires public agencies to report their costs and obligations pertaining to health and other benefits of current and future retired employees much like they now report pension plan obligations. These other post-employment benefits (OPEBs) - including such benefits as medical, dental, vision, hearing, life insurance, long-term care and long-term disability must be recognized as a current cost during the working years of an employee." Source: http://www.drydenllc.com/gasb45/whatisgasb.php4

1

2

Q. When did this come to light?

A. This became apparent in discussions with the City of Providence concerning GASB 43/45 and the potential impact on the City's and Providence Water's audited financial statements.

7 8

#### Q. Why wasn't this noticed sooner?

For some time now Providence Water has not reimbursed the 9 Α. City for Health care costs for employees in a direct 10 manner. It is included in the setup of employees in the 11 payroll system. Each week when our payroll is uploaded it 12 creates an expense and associated Due to City entry for 13 the week's payroll and fringe benefits. The amount is 14 then wired out of Providence Water's accounts. 15 past a check would be cut to do the same function. 16 Therefore, Providence Water was not processing an invoice 17 as such, and was not aware that the health care costs for 18 the retirees were not being charged to Providence Water. 19

20

21

22

23

24

25

26

2.7

28

### Q. What is the total amount that the City is owed since 1997?

A. Please see attached Exhibit JBB1 which shows the total amount of \$1,635,592. We are asking permission to pay the City back \$300,000 per year on this debt, which should take about 5½ years to repay in full. The City has agreed to waive collection of the costs incurred before 1997.

29

30

O. How was this calculated?

1 A. The City Controller's office took the actual costs for fiscal years 2005 and 2004. They then discounted the costs back for fiscal years 2003 through 1997, based on the annual working rate increases provided by Cooke & Co., the City's health care consultant.

#### Q. Have you reviewed their analysis?

A. Yes I have. I believe it is a reasonable method of estimating the outstanding liability.

#### Revenue Instability

#### 12 Q. What exactly do you mean by revenue instability?

A. Providence Water's revenues are now very dependent on volumetric revenue. In fact, approximately 85% of Providence Water's total revenue comes from consumption based revenue categories. Please see attached Exhibit JBB2. I have prepared this summary of the Docket 3684 approved revenue breakdowns.

Α.

#### Q. Is this a problem for Providence Water?

Yes. Providence Water is very dependant upon the weather and obviously has no control over this. With the majority of our revenues variable, and the majority of our expenses fixed, this creates a mismatch and results in a serious problem when consumption is down. According to an American Water Works Association Research Foundation (AWWARF) report, "Revenue instability causes direct costs to water suppliers in the form of increased costs for borrowing, to say nothing of the indirect but very real costs of more complicated planning to provide

		JEANNE DUNDAKE VSKIS
1		for a reliable supply of water in the future."2 Please
2		also see Paul Gadoury's testimony on this subject.
3		
4	Q.	Has Providence Water done anything about this in this
5		filing?
6	A.	Yes. We have asked our rate design consultants to take
7	•	this into consideration in designing the retail rates.
8		We have also increased our requested Net Operating
9		Reserve from 1.5% to 3%.
10		
11	Q.	What will this do?
12	A.	Having more of our revenue from fixed service charges as
13		opposed to variable consumption charges will provide more
14		reliable revenue. Increasing the reserve percentage will
15		provide more of a cushion, or risk margin, to hedge
16		against low revenues. This was one of the strategies
17		recommended in the AWWARF project report referred to
18		above.
19		
20	Q.	Has the utility served a notice of the rate filing or
21		the Department of Attorney General and other interested
22		parties?
23	A.	Yes. Included in this filing is a copy of the letter to
24		this effect and the letters to other affected parties.
25		
26	Q.	Have you addressed the items included in section 2.10 of
27		the Commission's Rules of Practice and Procedure in this
28		filing?

Revenue Instability and Conservation Rate Structures, AWWA Research Foundation, P. 1, 1995.

1 A. Yes, I believe we have. The appendix includes an index 2 which lists each item with the reference to its location 3 in the filing. The index was prepared by Providence 4 Water staff.

5

6

#### Q. Do you have any final comments?

Yes. Providence Water has established a good experience 7 Α. with our restricted funds. I believe we have managed 8 We are now faced with a large projected them well. 9 deficit in our IFR fund and have proposed a combination 10 of additional rate revenue and bonding to bridge this 11 deficit. We are utilizing financial consultants and the 12 assistance of RICWFA to do this. We will be filing with 13 the Division for approval of the borrowing. 14 included in this filing is our best plan at this time. 15 We may have to adjust this going forward, but would 16 appreciate the Commission's approval as we go forward. 17

18

19

- Q. Does this conclude your testimony?
- 20 A. Yes.

#### Exhibit JBB1

#### Retirees Health Care Costs - Debt Due to City Providence Water As of January 11, 2007 Summary

Fiscal Year	2005	\$	299,774
Fiscal Year	2004	\$	239,143
Fiscal Year	2003	\$	217,403
Fiscal Year	2002	\$	181,169
Fiscal Year	2001	\$	157,538
Fiscal Year	2000	\$	145,197
Fiscal Year	1999	\$	136,978
Fiscal Year	1998	\$	132,346
Fiscal Year	1997	\$	126,044
Total		\$	1,635,592
Annual Repa	yment Request	\$	300,000
Number of Years to pay off			5.45
Number of Tears to pay on			

### Revenue breakdown and percentage Providence Water

#### Docket 3684 Effective 1/1/06

Quarterly Service Charges	\$3,861,068	7.71%
Monthly Service Charges	\$6,35 <u>5</u>	0.01%
Total Service Charges	\$3,867,423	7.72%
Retail Consumption	\$29,653,421	59.21%
Wholesale Consumption	<u>\$12,727,674</u>	<u>25.42%</u>
Total Consumption	\$42,381,095	84.63%
Private Fire Service Charges	\$1,152,436	2.30%
Public Fire Service Charges	\$1,514,474	3.02%
Miscellaneous Revenue	<u>\$1,162,585</u>	<u>2.32%</u>
Total Revenue	\$50,078,013	100.00%

Source: Report & Order # 18496, Schedule TSC-11, page 2 of 2

DOCKET	NO.
DOOLL	110.

# ATTESTATION UNDER RULE 2.7 OF THE RULES OF PRACTICE AND PROCEDURE OF THE PUBLIC UTILITIES COMMISSION

I, Jeanne Bondarevskis, in conformance with Rule 2.7 of the Rules of Practice and Procedure of the Public Utilities Commission, hereby attest that the facts contained in my direct testimony with exhibits and supporting documents are true and correct to the best of my knowledge, information, and belief. All changes and differences between the books and test year data and any changes in the manner of recording said data during the test year have been expressly noted.

Deanne Bondarevksis

STATE OF RHODE ISLAND PROVIDENCE COUNTY

Subscribed and sworn to me this 200, of March, 2007.

Notary Public

Commission Expire 6-18-09